Media Literacy: The UK's undead cultural policy

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Abstract

This article examines media literacy in the UK: a policy that emerged within the Department for Culture, Media and Sport in the late 1990s, was adopted by the New Labour administration, and enshrined in the Communications Act 2003. That legislation gave the new media regulator, Ofcom, a duty to 'promote' media literacy, although it left the term undefined. The article describes how Ofcom managed this regulatory duty. It argues that over time, media literacy was progressively reduced in scope, focusing on two policy priorities related to the growth of the internet. In the process, media literacy's broader educative purpose, so clearly articulated in much of the early policy rhetoric, was effectively marginalized. From the Coalition government onwards, the promotion of media literacy was reduced further to a matter of market research. Today, if not altogether dead, the policy is governed by entirely different priorities to those imagined at its birth.

Introduction

The Communications Act 2003 requires the UK's communications regulator Ofcom to 'promote' what it calls *media literacy*. Although media literacy was never defined in statute, there has been a great deal of official policy 'guidance' on the subject, much of it generated in the period leading up to, and immediately following, the legislation. In 2004, the then Secretary of State for Culture, Media and Sport, Tessa Jowell, set out her vision for a broad and critical understanding of media, boldly predicting: '… in the modern world, media literacy will become as important a skill as maths or science. Decoding our media will become as important to our lives as citizens as understanding literature is to our cultural lives' (McNulty, 2004). Nevertheless, after an initial flurry of implementation activity, Ofcom and its bosses at the Department for Culture, Media and Sport (DCMS) grew progressively quieter on the subject. Over time, the silence became deafening. What media literacy is now supposed to be, and what Ofcom in particular is expected to do to *promote* it, was reduced in vision and scale as its funding was incrementally withdrawn. Today, Ofcom promotes media literacy almost exclusively through the provision of 'market data research' for 'stakeholders' (to adopt the language signaled by its website's designated URL), an activity that the regulator would almost certainly undertake with or without its statutory obligation to promote media literacy. Media literacy in 2016, therefore, may be characterized as one of the zombies of cultural policy: an instrument devoid of its original life but continuing in a limited state of animation governed by other policy priorities.

We have explained elsewhere the origins of media literacy within UK policy: how it emerged towards the end of John Major's Conservative administration, and started its

journey into legislation during the early years of New Labour (Wallis & Buckingham, 2013). This process began with concerns about media violence, and the proposal for a cross-departmental 'national campaign' for media education, particularly in schools (BBC, ITC & BSC, 1998). However, even during this early period, media literacy became a policy solution to a changing set of policy problems. By 2003, media literacy was being positioned as a means of *empowering the 'citizen-consumer'*, a potentially useful policy instrument for *responsibilising* the individual (Rose, 1989) in the face of the broader deregulation of the communications industries. The Communications Act implicitly recognises that in a market-driven, deregulated media environment, 'citizen-consumers' are enjoying greater choice that is increasingly difficult to regulate centrally. If potentially harmful consequences are to be avoided, people must make informed choices and be encouraged to choose in responsible ways: in line with many other areas of public policy, this reflects a transferring of responsibility away from centralised regulation to the individual (Wallis & Buckingham 2013; Buckingham 2009).

This transmutability of media literacy was made possible by a strategic lack of clarity, and reluctance on the part of policymakers to define it. Our comparative analysis of the policy discourses in play at the time revealed profound disparities between what was actually included within the terms of the legislation and many of the features that media literacy was presumed to embody. For example, early policy work supposed that the promotion of media literacy would be based on a broad understanding of what was meant by 'media', and require the promotion of 'critical viewing skills'. It was also assumed that it would require significant cross-Departmental collaboration, and involve schools and teachers. However, none of these features were made explicit in the Act.

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Rather, media literacy was positioned as a limited set of additional duties assigned to Ofcom, funded by a grant-in-aid. The regulator had no power to enforce media literacy (unlike most of its duties). Most significantly, despite some six years of policy evolution, media literacy remained undefined, and it was left to Ofcom to find a workable definition.

In this article we take up the story of media literacy from 2003 onwards to examine how Ofcom set about its work, and with what effect. We describe how media literacy continued to shift in focus, and (partly to fit Ofcom's other policy activity) to narrow in scope. In response to the new legislation, the regulator espoused a deliberately generalised definition, but one that never became a meaningful measure of its own policy work. Instead, over the following six years, media literacy was progressively reduced to the promotion of two specific policy priorities: e-safety and e-inclusion (with the latter eventually re-designated as 'digital participation'). By almost entirely removing any broader educational expectations of the kind envisaged by Tessa Jowell, this diminution rendered media literacy as potentially expendable not only as a term but also as a concept. By 2009, the government's *Digital Britain* White Paper was dismissing media literacy as 'a technocratic and specialist term, understood by policy makers but not really part of everyday language'; and it proposed to jettison it in favour of 'a National Plan for Digital Participation' (Department for Culture, Media and Sport & Department for Business, Innovation and Skills, 2009, p. 40). In this way, just as the journey of media literacy into statute had taken six years, so within a further six years it was being reimagined to the point at which, by the end of New Labour, little of its original life remained. Under the subsequent coalition government, there was a

continued withdrawal of grant-in-aid from the DCMS for this activity. This undead state of media literacy policy has continued since the Conservative government in 2015, and remains in play under the May administration at the time of writing.

So why has this aspect of cultural policy been so short-lived? We argue that the deliberate ambiguity of purpose, which had been intended to allow a breadth of interpretation and degree of adaptation prior to 2003, ultimately undermined it. Ofcom had been left to define and determine the direction of media literacy policy, and although it established an uncontested official definition, the new regulator confined the scope of its promotion of media literacy mainly to its own institutional priorities. One of the outcomes of this alignment of media literacy with the particular functions of Ofcom was its further distancing from those policy actors within the Department for Education and Skills (DfES)[1] who might otherwise have been expected to take some interest in a government policy that set out with such an explicitly educative purpose. Despite New Labour's commitment to 'joined-up government', there was an ineffectual relationship between the DfES and DCMS and a remarkable lack of co-ordination, not helped by a fairly entrenched suspicion of media education within the DfES. But it was also a disassociation evident even among committed educationalists (such as teachers of Media Studies) who were equally reluctant to align themselves with the priorities of what they saw as Ofcom's reductive media literacy policy. With only the most generalized (albeit uncontroversial) definition, media literacy continued to be employed to mean different things in different contexts, and in consequence became discursively

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[1] Designations for UK Government Departments are those that were in use at the time being discussed.

aligned to a number of different government initiatives over time. As it became steadily narrower in scope, it was only a small step to reduce it further merely to the collection and distribution of market research data.

Defining media literacy

Tasked with the responsibility to 'promote' media literacy, Ofcom had first to define it. In setting out to do so, initially through a public consultation between June and August of 2004, it captured the policy priorities it had interpreted from the Act in a single turn of phrase: Ofcom's 'vision' for media literacy was 'to inform and empower the citizen-consumer in the digital communications age' (Ofcom, 2004a, p. 7). Ofcom's starting point was not any British text, but a definition first formulated at a conference in Aspen, Colorado (Aufderheide, 1993, pp. *v*–6) and subsequently developed by the National Association for Media Literacy Education of North America: 'the ability to ACCESS, ANALYSE, EVALUATE and COMMUNICATE information in a variety of forms, including print and non-print messages' (NAMLE, undated). Ofcom's consultation document adapts this slightly, proposing that media literacy is 'a range of skills including the ability to *access*, *analyse*, *evaluate* and *produce* communications in a variety of forms' (Ofcom, 2004a, p. 4). The consultation that followed resulted in some further minor amendments, resulting in a revised definition: 'the ability to access, understand and create communications in a variety of contexts' (Ofcom, 2004b. p. 2)[2].

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[2] Ofcom's definition of media literacy was later revised again to its current formulation: 'the ability to use, understand and create media and communications in a variety of contexts' (Ofcom, 2016).

Despite being dismissed by some as anodyne, this broad brush definition was generally accepted, if not actively welcomed. Couched as it is in very broad terms, the intention was to find as near to a consensus as was going to be possible: 'short and simple but broad enough to cover all communication technologies and types of content and service as well as the different ways in which people use them' (p. 4). Ironically, however, this definition was far too broad for Ofcom usefully to apply to itself. Whilst it could pay lip service to such a definition, in practice Ofcom had already adopted a qualified and more particular notion of what media literacy was to mean for its own work. This was significantly predicated by what it interpreted as its broader role and responsibilities as set out in the Communications Act: 'Ofcom's responsibilities *do not encompass all aspects of media literacy* [emphasis added]. The Act makes it clear that our remit only relates to electronic communications broadcast and distributed over networks'. (Ofcom, 2004a, p. 5) At face value, the term 'electronic communication' might still have been assumed to embrace a number of older technologies. However, taking its cue from the main thrust of its broader responsibilities as set out in the Communications Act, and in particular, the phrase 'electronic communication broadcast and distributed *over networks* [emphasis added]', the need for media literacy was interpreted to be principally a consequence of 'the digital communications age', and for Ofcom, this enabled it to significantly circumscribe its own activity.

This double definition of media literacy required Ofcom to engage in a certain level of double-*think*, and reveals a tension within its strategy to promote media literacy from

the outset. Whilst on the one hand 'critical thinking skills such as questioning, analysing and evaluating' media (Ofcom, 2004b, p. 3) are explicitly acknowledged to be an important part of media literacy, on the other hand, the media literate person is consistently characterised as someone who demonstrates basic skills or competencies in the use of digital technology: 'such as [the ability to] write emails, create web pages or video materials' (p. 3). In terms of definitions of literacy, there is a move back from a notion of *critical* literacy to one of *functional* literacy (Street, 1984).

Promoting media literacy

Having defined media literacy to its own satisfaction, Ofcom's next task was to identify how best to *promote* it. The publication *Ofcom's strategy and priorities for the promotion of media literacy* (Ofcom, 2004b) set out the organisation's priorities in terms of three principal activities: 'research'; 'connecting, partnering and signposting'; and 'labelling'.

(i) Research

Ofcom itself has defined research as its 'most important tool to direct stakeholders' activity' (Ofcom, 2008, p 20). Its annual audits of media use both by children and adults (as well as various minority groups) are data-rich, and allow for extensive analysis, including year-by-year comparisons. These publications – all available from Ofcom's website – mostly follow a standard form of market research similar to that undertaken by many businesses: they offer an apparently objective and systematic gathering and analysis of data about the attitudes, preferences and behaviour of consumers within a particular market categorisation. While there may be some intention here to 'benchmark' the level or distribution of media literacy within society – and ultimately

perhaps, to provide some basis for assessing Ofcom's effectiveness in promoting it – the primary value of such statistics is to inform management decisions about the current and future development of the communications market. In consequence, they tend to be rich in detailed statistical information, but light on analysis beyond the immediate demands of the market. Significantly, in the terminology of Ofcom's broader definition of media literacy, they may be said to be auditing the ability to *access* rather than *understand* communication (Ofcom, 2004b, p. 4): these are studies of media *use* and not of *literacy* in any extended sense of the term.

These limitations of course reflect Ofcom's interpretation of its own remit, which requires it to analyse markets and assess competition, rather than evaluate cultural value or social significance (Harvey, 2006). It also excludes any media that are not 'electronic communications broadcast and distributed over networks', putting out-of-limits both 'print media' and film - arguably two important aspects of conventional media education. More significant still is Ofcom's understanding of 'media content' *per se*. Content is a term that is commonly understood within the cultural industries to refer to the programmes, information or visual material being transmitted/communicated. Ofcom, however, employs the term to refer to radio and television *services* (in order to distinguish them from the communications infrastructure, or 'carriage'). This redefinition removes from the frame of discourse any of the evaluative questions that might otherwise be asked about such things as the editorial practice of media programme makers or web content producers (which had been a major preoccupation of earlier regulatory bodies, such as the Independent Broadcasting Authority). Ofcom's research, therefore, is concerned with the technologies and platforms of communication,

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but not so much the content (in the conventional understanding of the term), and even less, what users make of that content.

Sylvia Harvey (2006) has noted that while Ofcom may argue that it was given no brief to take a close interest in the form and content of programmes, the Communications Act 2003 does, in fact, give Ofcom oversight to ensure both 'professional skill and integrity' and that 'cultural activity in the United Kingdom, and its diversity, are reflected, supported and stimulated' within programmes (Parliament, 2003: Clause 264). The requirements for news and current affairs, the principles of impartiality and of editorial integrity, and the issues of pluralism and diversity in programme content are all within Ofcom's remit. However, because the policy priority has so forcefully been marketisation and the creation of 'digital Britain', these broader cultural aspects of its responsibilities have been marginalised.

(ii) Connecting, partnering and sign-posting

The second of Ofcom's strategies for promoting media literacy was to be 'connecting, partnering and sign-posting'. What this means is best understood in relation to the regulator's measure of its own success in this area. In 2008, it published a review of its achievements in promoting media literacy in its first four years. The *Review of Ofcom's media literacy programme 2004-08* stated:

> We have put media literacy clearly on the agenda of all stakeholders. We provide leadership and stimulate debate with stakeholders, and speak at conferences and events throughout the UK, in Europe and beyond. We also add value to existing media literacy activity, stimulate new work, and promote and direct people to advice and guidance on new communications technologies. Ofcom has established effective partnerships with key stakeholders in government, education, the voluntary sector and the industries. (Ofcom, 2008, p. 16)

Ofcom's recognition of its need for 'partners' is tacit acknowledgement of the limitations and narrower agenda of its own activities, and the important role of 'educators, broadcasters, internet service providers, and others' (Ofcom, 2004a, p. 4). By its own account, Ofcom set out, for example, to 'establish partnerships with those stakeholders, particularly in education and in broadcasting, who can promote greater critical awareness of media' (Ofcom, 2008, p. 4).

However, a review of Ofcom's partnering activity reveals that the regulator prioritised (at least, numerically) organisations that reflected aspects of its *own* emerging priorities in this area. Only a quarter of its listed partners could be identified - implicitly or explicitly - as having an agenda that extended beyond questions of internet safety and technical competency. It would be unfair to downplay either the significance of Ofcom's support for these five groups (for example, it was a major sponsor of the Media Literacy Conference 2010 run by the Media Education Association and the Centre for the Study of Children, Youth and Media), or the strategic role in brokering partnerships and promoting debate across these different constituencies, played by Ofcom's then Head of Media Literacy, Robin Blake. Nevertheless, they are not typical of the majority of Ofcom's partnering activity; nor do they appear to have sat comfortably with the regulator's own sense of its purpose.

Two other areas of activity should also be mentioned here: the publication of an 'e-bulletin' (monthly until 2011, and then quarterly) containing summaries of news, initiatives and events being promoted by Ofcom's stakeholders; and a kitemark developed in collaboration with the Home Office, to help consumers identify internet filtering software that is 'easy to install, easy to use and effective in blocking

inappropriate online content such as pornography, violence and racism' (Ofcom, undated b). This BSI PAS 74 standard seems not to have been a great success, and at the time of writing, we could identify only one accreditation having been made.

(iii) Labelling (content information)

The rationale for 'labelling' relates directly to the process of responsibilisation discussed earlier: the transferring of responsibility away from centralised regulation towards the 'informed choice' of individual citizen-consumers. Ofcom considered its role to be as the provider of codes of practice, while it expected the industry to take responsibility in the form of 'self- and co-regulation'. In consequence: '...it will fall to all of us as individuals to take more responsibility for what we and our families watch and listen to. We will all become gatekeepers for content coming into our homes' (Ofcom, 2004b, p. 11). Hence the need for 'labelling' - providing the information each individual citizen-consumer would require in order to regulate media use in their own household (and, of course, 'those with the responsibility of care for young children may need particular help').

Ofcom's principal activity in this area in its first four years was to support the government advisory body, the Broadband Stakeholder Group (BSG), in facilitating the agreement of a 'voluntary, best practice guide for providers'. The result of this work, *Good practice principles: Empowering users to make informed choices for themselves and their families* (Broadband Stakeholder Group, 2008), indicates some of the limitations of such voluntary self-regulation. The message of the document is contained in five 'principles' (Broadband Stakeholder Group, 2008, p. 3), the substance of which may be summarized as: *if the provider deems that its content might be considered to be unsuitable or offensive, it will – at its own discretion - provide clear information to that*

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effect. In essence, this is the extent of the commitment of this non-binding agreement. The impact of this document, then, is circumscribed by its voluntary and subjective nature (and the conspicuous absence of Sky from its list of signatories), rendering it fairly ineffectual both as a form of control and as a means of promoting media literacy.

The Media Literacy Taskforce

Of those organizations that were funded and supported by Ofcom within the general sphere of 'partnership', the most policy-focused was the Media Literacy Taskforce. The Taskforce was formed at the instigation of the UK Film Council (UKFC), which was anxious to be seen to be taking more initiative in line with its own remit to support 'moving image' education – although it should be noted that the cinema has never been part of Ofcom's remit. An internal UKFC Board paper of around this time presents media literacy as 'crucial for the UK Film Council and BFI' (the British Film Institute), and 'a core objective which threads through almost all the work that the UK Film Council undertakes':

> The development of media literacy is essential to help advance a variety of key UK Film Council strategies and initiatives. Media literacy helps to foster the appreciation and enjoyment of cinema, by encouraging those skills and competencies which will enable audiences to enjoy a wider variety of films. It prepares individuals with a knowledge and understanding of the media that is a pre-requisite for recruitment into the workforce. Potentially, it can contribute to the greater effectiveness of anti-piracy work by developing people's understanding of intellectual property and its contribution to a successful creative economy. (Comley, 2005)

It was also hoped that being seen to promote media literacy would provide the UKFC and the BFI with 'better visibility with government'.

This particular interpretation and application of the concept of media literacy, incorporating film appreciation, preparation for work in the media industry, and even the combatting of film piracy – although significantly lacking any reference to broader educational or critical dimensions of media literacy – demonstrates again the elasticity of the term. But if the potential of media literacy as a practical and expedient way of addressing its own concerns was a positive reason for the UKFC to welcome it, there was also a negative reason. Left to its own devices, many foresaw that Ofcom's interpretation of media literacy would become entirely functional or protectionist, and that the opportunity afforded by the Communications Act might be altogether lost. According to a UK Film Council Senior Management Team meeting note: 'This work was urgent as it provided a broad alternative, that was empowering and creative, to the more limited and protectionist agendas of Ofcom and other industry groups' (UK Film Council, 2004a). In policy terms, what was needed was a broader position on media literacy 'in contradistinction to other more limited ones, either protectionist or purely technological, in the public and private sectors' (UK Film Council, 2004b). One long-serving member of the Taskforce recalls concerns about 'reducing media literacy to button-pressing on computers and mobile devices' (interview with Carol Comley, 29 August 2012), while another complained about Ofcom's 'very mechanistic' interpretation of media literacy and its neglect of 'creative and critical understanding' (interview with Neil Watson, 14 November 2012).

The Film Council played a key role in organizing a high-level conference entitled 'Inform and Empower: Media Literacy in the 21st Century' held at BAFTA on 27 January 2004, which aimed to gather 'stakeholders in industry, education and culture to develop the

case for promoting the concept of media literacy' (UK Film Council, 2004c, p. 8). The event drew some 200 'opinion leaders', and included a keynote address by Secretary of State Tessa Jowell. In her address to the conference, Jowell referred to media literacy as 'a coming subject' and one that 'in five years time will be just another given' (Jowell, 2004). Significantly, she also saw it as embracing all communications media, including the press and advertising.

Jowell's own position is principally rooted in a notion of the media as dominated by powerful and potentially harmful commercial and political interests. Children in particular need to be alive to these dangers, and consequently require 'critical life skills' (Jowell, 2004). This is precisely the view that she had expressed at drafting stage of the Bill (Wallis & Buckingham 2013) and it remained a persisting rhetorical theme. Of particular note is the continued certainty with which Jowell framed media literacy as an educational project that had inevitable implications for schools:

> ...the national curriculum has a role to play here for young people. Formal education already has a significant role. Increasingly, media literacy strands are developing within the National Curriculum: in the Citizenship strand, which engages with questions like "What makes a news story?" and "How are the media used to promote causes and campaigns?"; in the ICT strand, where pupils learn how to interrogate and communicate information, and to use technology in a way that serves their needs; and in the English strand, which examines the purpose and presentation of texts, including moving image texts. (Jowell, 2004)

Jowell was speaking here as the government minister responsible for culture, not education. The presence at the conference of only two delegates from the DfES is indicative of the continuing failure or unwillingness of educational policy-makers to address media literacy. Even so, such a large and high profile event was bound to bolster a sense that media literacy was now a major new force on the policy landscape,

and the idea for the Taskforce was mooted at a plenary session at the end of the day, as a group that would involve 'key change agents including Ofcom, DfES, DCMS and other national agencies' (UK Film Council, 2004d, p. 28) and would 'help to link Government objectives for media literacy with industry partners and educationalists' (UK Film Council, 2004e, p. 2).

The Taskforce proper was inaugurated two months later, and met monthly – notably without the involvement of the DfES. Its activities over the course of most of the following five years can be broadly categorised into four areas: the development of a Media Literacy Charter; policy work (in the form of a series of 'responses' to other policy initiatives and reviews, stating the case for media literacy); inter-organisational cooperation around projects that promoted media literacy; and the hosting of a second major conference in 2007, the Digital Media Literacy Conference.

Whilst various aspects of these activities are thought to have had some merit, most of the Taskforce participants we spoke to retrospectively acknowledged that it largely failed to be more than the sum of its parts. Reasons for this were variously attributed to significant differences in institutional culture, lack of resources, clashes of personality, and in particular, its inability to address one of the key tensions that runs through so much of the policy discourse on media literacy, namely, its implications for formal education. The latter point exacerbated a division within the group between those who believed that media literacy was essentially an educational project and that this should be the Taskforce's principal focus, and those who took a more pragmatic view that there were still plenty of other things to do. In general, the industry representatives were much more keen on the 'creative' dimensions of media literacy – for example, by

offering short-term opportunities for school students to become involved in television production – than in any more 'critical' aspects. What both sides acknowledged was that the non-engagement of the DfES was a source of considerable frustration.

'The elephant that never turned up in the room'

Whether courted by the Media Literacy Taskforce, Ofcom, or even DCMS itself, there was a consistent and determined resistance to engagement in any of these initiatives on the part of the DfES - 'the elephant that never turned up in the room' as Ofcom's Head of Media Literacy, Robin Blake, aptly put it (interview, 9 October 2012). Whereas the duty to promote media literacy was enshrined in law for Ofcom, there is no similar legal duty assigned to its sister regulator Ofsted (or any other government agency concerned with education). In consequence, promoting media literacy was never a DfES-wide policy objective, and only ever featured as a marginal concern within other general areas of policy. This, in part, explains why the term seems to have had such little resonance for many within the DfES during the period examined here: what may have been identified as media literacy policy by some, was not necessarily clearly labelled as such, and was categorised differently – if it was acknowledged at all - within other policy areas. From the perspective of the policy team at the UKFC, and the Media Literacy Taskforce, it was a frustrating demonstration of 'lack of joined-up government' (interview with Carol Comley, 29 August 2012). However, despite an absence of common language, it is nevertheless possible to identify various DfES policies that many would have recognised as containing aspects of media literacy (albeit not identified as such) within curriculum policy, within more general ICT policy, and within policy related to increasing concerns about the safeguarding of children.

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Many educationalists (including some officials within the DfES) for example, would broadly recognize the curriculum subject of Media Studies as concerned with the promotion of media literacy. But this association is problematic on two related counts. First, the term media literacy appears not to be widely 'owned' by the Media Studies community itself. Second, there has been a concerted and consistent effort made by a range of actors (both from within Media Studies and outside it) not to allow media literacy to become 'confused' with Media Studies. On the whole, this is born of anxieties about the widespread vilification of the subject of Media Studies, and/or with the criticism of media literacy as a 'bland' or a 'policy wonk-type phrase' (interview with Jenny Grahame, 24 May 2012). On both sides, the shared concern is the effect on either of tar from the same brush.

David Blunkett (Secretary of State for Education, 1997–2001), identified many features of media literacy with the new subject area of Citizenship (correspondence with David Blunkett, 22 June 2012), but here too there was a lack of recognition of the term on the part of teachers. Schools Minister Jim Knight preferred to identify media literacy with the subject of Information and Communication Technology (ICT) (interview with Jim Knight, 8 March 2012). The importance of ICT throughout the New Labour years, reflected in enormous investment in this area made across all areas of government, resulted in both the ascendancy of ICT as a curriculum subject, and in the dizzying number of initiatives applying technology to improve school efficiency and effectiveness; yet media literacy rarely featured in this context, which was dominated by a functional view of technology and conspicuously lacking in any broader critical

perspective, or indeed in much sustained engagement with popular culture
(Buckingham, 2007).

Old solution, new problems

As we have argued previously, at the point at which it entered policy discourse, media
literacy had been intended to help to address the perceived problem of media violence.
By the time it entered statute, it had been repositioned as a solution to the problem of
deregulation and the need to 'arm the consumer' (Wallis & Buckingham, 2013).
Following the legislation, the problem in focus changed once more to the new challenges
posed by the internet. By the end of the Blair era, the transformational possibilities of
digital technology had come to influence Government policy thinking at almost every
level. Yet at the same time, there had been growing concern about what scholars had
been referring to since the turn of the century as the 'digital divide' (Norris, 2001): the
notion that the internet might replicate, rather than transform, existing patterns of
social inequality. By the time of the Brown administration, with more than 17 million
people in the UK not engaged in the use of computers or the internet, a direct
correlation was being made between those who were *socially* excluded and those who
were 'digitally excluded'. Digital exclusion, therefore, became 'an increasingly urgent
social problem' (Communities and Local Government, 2008, p.6).

Meanwhile, there was also increasing concern about the risks of 'offensive or distasteful'
material being accessed by children, and in the run-up to the Communications Act,
media literacy was thought by some to have a role in countering this (House of
Commons, 2002). In the following years, the largely unregulated nature of internet

activity, the anonymity involved in much of its use, and increasing ease of access (heavily promoted by the Government itself) resulted in growing public alarm, fuelled by stories of children being exposed to aggressive marketing and misinformation; accessing pornographic images and those of extreme violence; online bullying and harassment, and direct contact from predators. By the mid-2000s, Government needed to be seen to be doing more to protect children deemed to be at risk from harmful and inappropriate 'content, contact and conduct' (Livingstone & Haddon, 2009). As priorities shifted, therefore, the idea of media literacy increasingly became aligned to projects related to online safety.

This elision was particularly apparent in a report commissioned by the incoming Prime Minister Gordon Brown in 2007. Brown invited the TV personality and Consultant Clinical Psychologist, Tanya Byron, to undertake a review to assess the risks to children of the internet and video games. Her report, *Safer children in a digital world* (Byron, 2008), was published in March of the following year. Byron's raft of recommendations included a 'sustained information and education strategy' aimed at both the general public, and specifically at children and young people through schools. Throughout her Report, Byron's relationship with the term media literacy is somewhat ambivalent. She describes media literacy as 'abstract' and 'difficult to translate into something that is meaningful to the public', and fears it may distract attention from her primary focus on safety (Byron, 2008, p. 109). Nevertheless it is a term that she frequently uses, often in conjunction with the term e-safety, as in her recommendation (5.126) that Ofsted should 'undertake a thematic study on the teaching of e-safety *and media literacy* [emphasis added] across what schools offer' (Byron, 2008, p. 134).

Perhaps the most notable feature of Byron's report in this respect is that she unequivocally attributes a major responsibility for e-safety directly to the Education Department. Whilst this had certainly been part of the remit of the Department's technology agency Becta prior to 2008, it had hardly been high on the Department's list of priorities. Like *Violence and the viewer* (BBC et al., 1998) - the report that had introduced media literacy to UK policy a decade earlier - Byron's call is for a cross-Departmental response, but with a specific role for the Education Department: delivering e-safety through the curriculum, providing teachers and the wider children's workforce with the skills and knowledge they need, reaching children and families through Extended Schools and taking steps to ensure that Ofsted holds the system to account on the quality of delivery in this area (Byron, 2008, p. 8).

Such a logical and definite attribution of responsibility for an aspect of media literacy (hitherto a cultural policy initiative) to the DCSF (the Department of Children, Schools and Families, as the Education Department had by then become) was not something that could be dismissed lightly. A number of civil servants interviewed as part of this research suggested that the Byron Report signaled a significant shift in the Department's agenda in relation to media literacy. Previously, it had been thought of - if at all - either as part of Media Studies, or an aspect of ICT. Byron's Report represented a turning point, particularly as it was followed within a year by *Digital Britain*, to which Tanya Byron was also a contributor. It should also be emphasized that Byron's view of media literacy, and of internet safety more broadly, was not narrowly protectionist: it embraces the notion that media and technology have the potential to be a positive force in the lives of children and young people. However, the remit of her review was

explicitly to advise the Government on matters of e-safety, and her interest in media literacy was contained within these terms of reference. As such, the superficial impression of the Report is that media literacy is broadly synonymous with education for e-safety.

Digital Britain and the decline of media literacy

Meanwhile, another of Gordon Brown's first actions as incoming Prime Minister in 2008 was to invite Stephen Carter, Ofcom's first Chief Executive, to take up a position of Special Advisor. Following the rapid award of a peerage, Carter was appointed to a position of junior Minister with responsibility for Communications, Technology and Broadcasting. Working jointly to both Business Secretary Peter Mandelson and Culture Secretary Andy Burnham, he was to produce a White Paper to set out a vision for 'a digital Britain' - an action plan that would secure for the country a leadership role in the new digital world.

Carter's interim *Digital Britain* report was published in January 2009. In it, the importance of media literacy was seemingly endorsed: 'The necessary education, skills and media literacy programmes to allow everyone in society to benefit from the digital revolution will be a central part of the Digital Britain work and key to our success' (Department for Culture, Media and Sport & Department for Business, Enterprise and Regulatory Reform, 2009, p. 5). However, although the term media literacy is used throughout the document, so too is the more specific reference to '*digital* media literacy', and the implication seems to be that media literacy is entirely about 'being digital' (p.

61). By the publication of the final report in June 2009, this had significantly altered. What had earlier been described as a need for a National Media Literacy Plan was now rebranded as a 'National Plan for Digital Participation'. Indeed, as we have noted above, media literacy is unexpectedly marginalised as 'a technocratic and specialist term'. A new term is required, and a new definition necessary:

> It is important that Government provides clear strategic leadership and vision. To do so, we believe it is now vital to move away from media literacy as a discrete subject and term and to move towards a National Plan for Digital Participation... We believe that Digital Participation can be defined as: "Increasing the reach, breadth and depth of digital technology use across all sections of society, to maximise digital participation and the economic and social benefits it can bring." (Department for Culture, Media and Sport & Department for Business, Innovation and Skills, 2009, pp. 40-41)

This sleight of hand in the *Digital Britain* final report left many of those who had been working to promote media literacy with a sense of ambivalence. On the one hand, Carter's report appeared to endorse many of the things that were seen to be integral to media literacy. On the other hand, it was being proposed that media literacy as a term should be assigned to the scrapheap of history.

The coalition government and beyond

If media literacy had been in terminal decline by the end of the New Labour era, the general election of 2010 did nothing to reverse its fortunes. In a response to an open letter from Professor Sonia Livingstone of the LSE, the coalition government's first Culture Secretary, Jeremy Hunt, attributed four functions to media literacy: 'enhancing people's engagement with digital media'; 'helping to promote the UK's digital economy'; 'securing suitable uptake of the online delivery of public services'; and 'addressing concerns about potentially harmful media impact' (Hunt, 2011). More significantly, he

admitted to a reduction of support for Ofcom's media literacy work, effectively phasing out all its activities apart from research. Within a year of the general election, most of the key players within Ofcom's Media Literacy department had left the organization, and although the e-Newsletter has continued, the main focus of the regulator's work was quickly reduced to 'market data research'. One striking feature of Hunt's letter is a reference to the government's education policy in making the following claims that: media literacy skills can already be found in the curriculum for history, geography and English; schools are 'free to develop media literacy'; the new national curriculum review had undertaken a consultation, and any views on media literacy were 'welcomed'; the policy team responsible for technology would be 'working on a new strategy' following the closure of Becta; the Wolf Review included 'exploring the role of media literacy'; and support will continue for Media Smart – an industry-funded initiative focused on teaching about advertising in schools.

Three aspects of Hunt's letter should be noted in particular. First, the functions of media literacy referenced here provide a useful and succinct summary of what media literacy had become: helping to make the UK a bigger player in the digital marketplace, digital engagement (now very explicitly linked with access to 'online delivery of public services'), and online security – all familiar themes. Second, the content reveals less about the Coalition's media literacy policy than it does a new ideological commitment to smaller government. Schools are 'free to develop media literacy' in the same way as they are free to teach the lost language of Koro. This is not an endorsement of media literacy so much as a commitment to the reduction of a prescriptive national curriculum. Third, and most striking, is that despite the transmogrification of media literacy in the

ways discussed within this article, and the considerable distance travelled from its earlier shape, there remained a persistent impulse to associate it with the role of schools, and however implausible, an enduring impression that the responsibility for media literacy was one that the Culture department was sharing with the DfE. Yet the rhetoric obfuscated the reality. By the time of the new Conservative administration in 2015, media literacy had become no more than a label for market research.

Nevertheless, Ofcom's model of media literacy has continued to be influential internationally – at least for other media regulators, if not very much for ministries of education. There have been several EU initiatives in the area, although here too the policy momentum seems to have dissipated in recent years. One fundamental problem here is that, while there is some limited traction with EU-wide media regulation – especially if it is seen to protect the competitive position of European media industries – education policy remains a responsibility for member states. More widely, there have also been recent attempts to conflate media literacy with the notion of 'information literacy', especially in the work of UNESCO[3].

Conclusion

Policy exists in order to solve problems, real or imagined. Media literacy had first entered policy discourse in response to a perceived problem of media violence. However, at the point at which it had been enshrined in statute, the problem had

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[3] Exemplified by UNESCO's Global Alliance for Partnerships on Media and Information Literacy (GAPMIL) – see http://www.unesco.org/new/en/gapmil.

changed: it had become the need to 'arm the consumer' to be self-regulating. The lack of any clear definition of media literacy in statute allowed it to become a flexible instrument. Ambiguity in policy language has long been a way of reducing conflict and addressing what Richard Matland has called the 'dysfunctional effects of clarity': 'the clearer goals are the more likely they are to lead to conflict' (Matland, 1995, p. 158). From 2003 onwards, the lack of clarity over definition and its consequent ambiguity of purpose, allowed media literacy to become a policy instrument with which a range of policy problems could be addressed. As we have shown, these problems steadily narrowed in scope, to the extent that any broader educational or cultural view of media literacy was effectively ignored. Media literacy became a functional tool that would both help to keep children 'safe' and promote access to technology, especially among marginalized groups. These were undoubtedly important issues, that had an urgency and an apparent clarity of purpose – and hence a purchase in public and policy debates - that a broader view of media literacy ultimately did not. As funding was then withdrawn, and the final vestiges of the original vision to promote a broad and critical understanding of media evaporated completely, only the term remained. Media literacy is still enshrined in law, but it has become a cultural policy that is effectively dead - or perhaps one that should better be thought of as undead.

As numerous critics have argued (e.g. Hewison, 2014; Hesmondhalgh et al., 2015) New Labour's cultural policy-making largely sought to avoid regulation of the market, except where it was believed to be unavoidable. As in education policy (Ball, 2013), the market was deemed to be a more efficient means of addressing the needs of the citizen-consumer, except in rare instances of 'market failure'. Media literacy represented a

possible means of counterbalancing the potentially negative consequences of this stance – something that cynics might see as a kind of concession to social democracy. Yet the wider political concerns expressed, for example, by Tessa Jowell, are (to say the least) very far from those of contemporary cultural policy under the Conservatives.

To some extent, therefore, the demise of media literacy might be seen as simply a matter of 'wrong time, wrong place': there were too many competing interests at stake in it, and other policy imperatives eventually became more pressing. Yet the abandonment of media literacy also raises the question of how far governments really *want* citizens to adopt a critical stance towards media, however much they might pay lip-service to the idea from time to time. It might be worth speculating – in the wake of the Leveson Inquiry Report (DCMS & Leveson, 2012) in particular, but also the increasingly confrontational nature of social media – whether it is time for the zombie of media literacy to be prodded back into life.

Funding

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